

REMARKS

At the outset, applicants and their attorneys wish to thank the Examiner for the recent discussion of the above-identified application.

As was pointed out in the course of the discussion, the present invention saves energy by recycling to the first crystallizer, an output from the first crystallizer or the first separator, bypassing the second crystallizer.

Remember that the output from the first crystallizer and its separator are relatively warm, and that from the second crystallizer and its separator are relatively cold.

If you recycle from the second crystallizer or its separator, as the British Patent 1 453 645 does via line 41, then you have to provide a substantial amount of heat for this stream, as the British patent does at 23, before recycling via 40 into the first crystallizer 14.

But with the present invention, in which it is a relatively warm stream that is recycled, the need for anything like the unit 23 of the British patent can be greatly reduced or even eliminated.

The other applied reference, that to WILSAK, is of no help to the rejection. WILSAK teaches recycle to the first crystallizer 150 or (Figure 2) or 400 (Figure 3), but this recycle is far downstream from even the third crystallizer 350 or 600.

Now let's try the rejection the other way around, which is the way it was actually applied in the Official Action: namely, WILSAK in view of the British patent. Notice that the material that is recycled via 40 in the British patent, to first crystallizer 14, is all the material from the second wash column 20. This would correspond, in WILSAK, to recycling all the output from WILSAK separator 133 (Figure 2) or 218 (Figure 3), back to the first crystallizer 150 or 400. But if you do that in WILSAK, then you have no feed for the third crystallizer 350 or 600. So a person of ordinary skill in this art would not follow the teaching of the British patent, in order to modify WILSAK. In other words, the combination of references leads nowhere.

Although it is believed that the novel subject matter of the present invention was brought out in claims 19 and 24 as previously constituted, nevertheless, the above amendments are made so as to make unmistakably clear that we bypass the second crystallizer in our Figure 2 and Figure 3 embodiments, and also the first separator in our Figure 2 embodiment (claim 19).

In view of the recent discussion and the present amendment and the foregoing remarks, therefore, it is believed that this application has been placed in condition for allowance, and reconsideration and allowance are respectfully requested.

The Commissioner is hereby authorized in this, concurrent, and future replies, to charge payment or credit any

overpayment to Deposit Account No. 25-0120 for any additional fees required under 37 C.F.R. § 1.16 or under 37 C.F.R. § 1.17.

Respectfully submitted,

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A handwritten signature in black ink, appearing to read 'Robert J. Patch', written over a horizontal line.

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